

No. 14-41127

In the United States Court of Appeals for the Fifth Circuit

MARC VEASEY; JANE HAMILTON; SERGIO DELEON; FLOYD CARRIER; ANNA BURNS; MICHAEL MONTEZ; PENNY POPE; OSCAR ORTIZ; KOBY OZIAS; LEAGUE OF UNITED LATIN AMERICAN CITIZENS; JOHN MELLOR-CRUMLEY; KEN GANDY; GORDON BENJAMIN, Plaintiffs-Appellees,
TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, Intervenor Plaintiffs-Appellees,

v.

GREG ABBOTT, in his Official Capacity as Governor of Texas; CARLOS CASCOS, Texas Secretary of State; STATE OF TEXAS; STEVE MCCRAW, in his Official Capacity as Director of the Texas Department of Public Safety, Defendants-Appellants.

UNITED STATES OF AMERICA, Plaintiff-Appellee,
TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND; IMANI CLARK, Intervenor Plaintiffs-Appellees,

v.

STATE OF TEXAS; CARLOS CASCOS, Texas Secretary of State; STEVE MCCRAW, in his Official Capacity as Director of the Texas Department of Public Safety, Defendants-Appellants.

TEXAS STATE CONFERENCE OF NAACP BRANCHES; MEXICAN AMERICAN LEGISLATIVE CAUCUS, TEXAS HOUSE OF REPRESENTATIVES, Plaintiffs-Appellees,

v.

CARLOS CASCOS, Texas Secretary of State; STEVE MCCRAW, in his Official Capacity as Director of the Texas Department of Public Safety, Defendants-Appellants.

LENARD TAYLOR; EULALIO MENDEZ, JR.; LIONEL ESTRADA; ESTELA GARCIA ESPINOSA; MARGARITO MARTINEZ LARA; MAXIMINA MARTINEZ LARA; LA UNION DEL PUEBLO ENTERO, INCORPORATED, Plaintiffs-Appellees,

v.

STATE OF TEXAS; CARLOS CASCOS, Texas Secretary of State; STEVE MCCRAW, in his Official Capacity as Director of the Texas Department of Public Safety, Defendants-Appellants.

On Appeal from the U.S. District Court for the Southern District of Texas, Corpus Christi Division, Nos. 2:13-cv-193, 2:13-cv-263, 2:13-cv-291, and 2:13-cv-348.

MOTION OF *AMICI CURIAE* THE AMERICAN CIVIL LIBERTIES UNION AND THE AMERICAN CIVIL LIBERTIES UNION OF TEXAS TO SUPPLEMENT THE RECORD ON APPEAL

SUPPLEMENTAL STATEMENT OF INTERESTED PERSONS

Pursuant to Federal Rule of Appellate Procedure 26.1 and Fifth Circuit Rule 29.2, *amici curiae* provide this supplemental statement of interested persons in order to fully disclose all those with an interest in this brief. The undersigned counsel of record certifies that the following supplemental list of persons and entities have an interest in the outcome of this case. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

<i>Amici Curiae</i>	Counsel
American Civil Liberties Union	Dale E. Ho Sean J. Young
American Civil Liberties Union of Texas	Rebecca L. Robertson Satinder Singh

Amici curiae certify that they are 501(c)(3) nonprofit corporations. None of the *amici* has a corporate parent or is owned in whole or in part by any publicly held corporation.

Amici curiae the American Civil Liberties Union (“ACLU”) and the American Civil Liberties Union of Texas (“ACLU-TX”) respectfully move this Court to supplement the record on appeal with two exhibits that are referenced by the *amicus* brief filed last Tuesday, March 10, 2015, and are attached herein. *Amici* have consulted with counsel for all parties, who do not oppose the relief requested.

On March 10, 2015, the ACLU and ACLU-TX filed an *amicus* brief in support of Plaintiffs-Appellees and in support of affirmance. Counsel for all parties consented to the filing of this brief. Br. of *Amici Curiae* ACLU & ACLU-TX at vi. The *amicus* brief referenced two attached exhibits: Exhibit A comprised excerpts from the trial transcript of *Frank v. Walker*, No. 11-cv-1128 (E.D. Wis. 2011), and Exhibit B was a trial exhibit relied upon at that trial. These exhibits were attached for this Court’s convenience.

Because the exhibits may aid this Court in deciding the instant appeal, *amici* respectfully move to supplement the record on appeal with these exhibits.

Dated this 18th day of March, 2015.

Respectfully submitted,

/s/ Sean J. Young

Dale E. Ho

Sean J. Young

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Counsel for Amici Curiae

CERTIFICATE OF CONFERENCE

I hereby certify that on March 16-18, 2015, I conferred with counsel for all parties and they do not oppose this motion.

/s/ Sean J. Young
Sean J. Young

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2015, the foregoing motion was served, via the Court's CM/ECF Document Filing System, upon all counsel of record.

/s/ Sean J. Young
Sean J. Young

CERTIFICATE OF COMPLIANCE

Counsel also certifies that on March 18, 2015, the foregoing motion was transmitted to the Clerk of the United States Court of Appeals for the Fifth Circuit via the Court's CM/ECF Document Filing System.

Counsel further certifies that the electronic submission is an exact copy of the paper document in compliance with Fifth Circuit Rule 25.2.1.

/s/ Sean J. Young
Sean J. Young